

Hearing Date: 5/4/2022 10:00 AM
Location: Richard J Daley Center
Judge: O'Hara, James N.

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

FILED
2/25/2022 12:08 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2022L001900
Calendar, A
16855267

REEM DARWISH,)
)
Plaintiff,)
)
v.) NO.
)
AMTRAK;)
CHICAGO UNION STATION COMPANY;)
NATIONAL RAILROAD PASSENGER)
CORPORATION,)
Defendants.)

COMPLAINT AT LAW

NOW COMES the Plaintiff, REEM DARWISH, and complaining of the Defendants National Railroad Passenger Corporation, Amtrak and Chicago Union Station Company, alleges as follows:

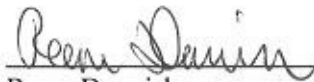
1. That on or about June 18, 2018, and prior thereto, the Defendant(s) owned, possessed, managed, maintained, constructed, installed, and controlled and/or had duty to possess, operate, manage, maintain, construct, install and control, both directly and indirectly, individually and through their agents, servants and employees, certain premises that included a certain door located at approximately Union Station, 225 S. Canal St., in the City of Chicago, County of Cook and State of Illinois.
2. That on or about June 18, 2018, and prior thereto, there was a firm of corporation other than Defendant(s) that owned, possessed, operated, managed, maintained and controlled and/or had a duty to possess, operate, manage, maintain and control, both directly and indirectly, individually and through their agents, servants and employees, certain premises that included a certain door located at approximately Union Station, 225 S. Canal St., in the City of Chicago, County of Cook and State of Illinois.



3. That on or about June 18, 2018, and prior thereto, the Defendant(s) contracted with a firm corporation that owned, possessed, operated, managed, maintained and controlled and/or had a duty to possess, operate, manage, maintain, and control, both directly and indirectly, individually and through their agents, servants and employees, certain premises that included a certain door located at approximately Union Station, 225 S. Canal St., in the City of Chicago, County of Cook and State of Illinois.
4. That at aforesaid time and place, Plaintiff Reem Darwish was an invitee and was injured by the door in the City of Chicago, County of Cook and State of Illinois.
5. That at the aforementioned place and at the aforementioned time, and prior thereto, the Defendant(s) knew or should have known or expected that Plaintiff would not discover or realize the danger, would fail to protect against it, or would forget the danger.
6. That the aforesaid Defendant(s) had a duty to exercise reasonable care for the safety of the Plaintiff.
7. That the aforesaid Defendant(s) were then and there guilty of one or more of the following acts and/or omissions:
 - a) Failed to place or operate said door in a safe, suitable and proper manner;
 - b) Failed to maintain the door;
 - c) Failed to adequately regulate the speed of the door;
 - d) Permitted the door to become in a state of disrepair;
 - e) Permitted the door to operate at unsafe speeds;
 - f) Failed to adequately protect the door and/or perform preventative maintenance;
 - g) Failed to utilize proper equipment in regulating the speed of the door;
 - h) Failed to warn of the danger of the door;

- i) Failed to maintain the aforementioned door in a condition that was reasonably safe;
 - j) Failed to adequately train to prevent the aforementioned a-I;
 - k) Failed to have an adequate policy to prevent the aforementioned a-I;
 - l) Failed to adequately preplan prevent the aforementioned a- I;
 - m) Failed to provide adequate protocol and/or rules.
8. That at said time and place, Plaintiff was injured by said door.
9. That one or more of the aforesaid acts or omissions constituting legal misconduct of the Defendant(s) was a proximate cause of said occurrence and Plaintiff(s) personal injuries as hereinafter mentioned.
10. That as a direct and proximate result of one or more of the aforesaid and/or omissions of the Defendant(s), the Plaintiff then and there sustained severe and permanent injuries, both internally and externally, and was and will be in the future hindered and prevented in whole or in part from attending to usual duties and affairs, and has lost and in the future will lose, the value of that time, and has suffered a loss of earning capacity, as aforementioned. Furthermore, the Plaintiff also suffered great pain and anguish both in mind and body, and will in the future continue to suffer; the Plaintiff further expended and became liable for and will in the future expend and become liable for large sums of money for medical care and services endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff(s) demand judgment against the Defendant(s) in a dollar amount to satisfy the jurisdictional limitation of this court, and in such additional amounts as the Court shall deem proper, plus the costs of this action.

A handwritten signature in black ink, appearing to read "Reem Darwish", is written over a horizontal line.

Reem Darwish

Plaintiff

1 Westbrook Corporate Ctr., Suite 300
Westchester, IL 60154
(708) 270-5909

REEM DARWISH,

Plaintiff,

v.

NO.

AMTRAK;
CHICAGO UNION STATION COMPANY;
NATIONAL RAILROAD PASSENGER
CORPORATION,
Defendants.

Reem Hassan

Reem Darwish
Plaintiff
1 Westbrook Corporate Ctr., Suite 300
Westchester, IL 60154
(708) 270-5909